

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

(1) GREAT LAKES INSURANCE SE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-22-702-JD
	)	
(2) FREDY VALLE d/b/a VALLE	)	
TRUCKING;	)	
(3) SILVER STAR CONSTRUCTION	)	
COMPANY, INC.;	)	
(4) TYLON MACKEY;	)	
(5) ISRAEL JUAREZ;	)	
(6) ORD TRUCKING, INC.;	)	
(7) ZURICH AMERICAN INS. CO.	)	
	)	
Defendants.	)	
	)	
and	)	
	)	
(8) ZURICH AMERICAN INS. CO.,	)	
	)	
Third-Party Plaintiff,	)	
v.	)	
	)	
(9) BERKSHIRE HATHAWAY	)	
HOMESTATE INS. CO., and	)	
(10) PROGRESSIVE NORTHERN INS. CO.,	)	
	)	
Third-Party Defendants.	)	

**PLAINTIFF’S WITNESS LIST**

Pursuant to the current Scheduling Order, Plaintiff Great Lakes Insurance SE (“Great Lakes”) submits the following Witness List, which is based upon presently available information and evidence, and Great Lakes reserves the right to amend and/or further supplement this list as discovery is completed.

**WITNESSES**

<b>No.</b>	<b>Name</b>	<b>Proposed Testimony</b>
1.	Representative for Great Lakes Insurance SE c/o Doerner, Saunders, Daniel & Anderson, L.L.P. 210 Park Ave STE 1200, Oklahoma City, OK 73102	Facts and circumstances related to request for defense from Valle Trucking and Silver Star, facts and circumstances related to coverage availability under Great Lakes' Policy.
2.	Tylon Mackey c/o Ryan Polchinski Law Offices of Daniel Davis 300 N. Walnut Ave. Oklahoma City, OK 73104	Facts and circumstances related to the underlying lawsuit, and tender of defense to Great Lakes and other Defendants.
3.	Israel Juarez c/o Mark Warman Levinson, Smith & Huffman 1743 E. 71 <sup>st</sup> Street Tulsa, OK 74136	Facts and circumstances related to the underlying lawsuit.
4.	Representative of Valle Trucking c/o Fredy Valle 2449 SW 90 <sup>th</sup> Street Oklahoma City, OK 73159	Facts and circumstances related to the underlying lawsuit, and tender of defense to Great Lakes and other Defendants.
5.	Representative of Silver Star c/o J. Chris Horton PO Box 576 El Reno, OK 73036	Facts and circumstances related to the underlying lawsuit, and tender of defense to Great Lakes and other Defendants.
6.	Representative of ORD Trucking c/o Rodney Stewart Stewart Law Firm 801 N.W. 63 <sup>rd</sup> Street, Suite 100 Oklahoma City, OK 73116	Facts and circumstances related to the underlying lawsuit.
7.	Representative of Progressive Northern Ins Co. c/o Bradley Bowlby Starr, Begin, & King 1800 S. Baltimore Ave, Suite 550	Facts and circumstance related to policy of insurance issued to Valle Trucking, any tender of defense, and priority of coverage.

No.	Name	Proposed Testimony
	Tulsa, OK 74119	
8.	Representative of Zurich American Ins. c/o Amy Hampton Aston, Mathis, Campbell 2642 E. 21 <sup>st</sup> , Suite 250 Tulsa, OK 74114	Facts and circumstance related to policy of insurance issued to Silver Star, any tender of defense, and priority of coverage.
9.	Witnesses identified by Defendants, to the extent not objected to by Plaintiff	
10.	Witnesses required for authentications exhibits	
11.	Witnesses identified during remaining discovery	

DOERNER, SAUNDERS, DANIEL & ANDERSON,  
L.L.P.

By: s/Emily Allan

Michael Linscott, OBA No. 17266  
Brian M. Keester, OBA No. 33208  
Two West Second Street, Suite 700  
Tulsa, OK 74103-3117  
Telephone 918.591.5288  
Facsimile 918.925.5288  
Email: [mlinscott@dsda.com](mailto:mlinscott@dsda.com)  
[bkeester@dsda.com](mailto:bkeester@dsda.com)

-and-

Emily E. Allan, OBA No. 33456  
210 Park Avenue, Suite 1200  
Oklahoma City, OK 73102  
Telephone: 405-898-8653  
Fax: 405-898-8683  
Email: [eallan@dsda.com](mailto:eallan@dsda.com)

***Attorneys for Plaintiff Great Lakes Insurance  
SE***

**CERTIFICATE OF ELECTRONIC SERVICE**

I hereby certify that on September 5, 2023, I electronically filed the foregoing Final Witness & Exhibit List the Clerk of the U.S. District Court, Western District of Oklahoma, using the electronic case filing system of the Court.

*s/Emily Allan*

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